



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

FEB 12 2015

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Article Number: 7000 1530 0002 6198 9702

Elaine Super
Egg Harbor Township MUA
3515 Bargaintown Road
Egg Harbor Township, NJ 08234

**RE: Request for Information (RFI) Pursuant to Section 308 of the Clean Water Act
Egg Harbor Township Municipal Utilities Authority Sanitary Sewer System
NJPDES Tracking No. NJP000344
Docket No. CWA-IR-15-017**

Dear Ms. Super:

As part of a joint effort between the United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (NJDEP) to ensure that the discharge of sanitary sewage is minimized, we conducted a Compliance Evaluation Inspection (CEI) of your sanitary sewer system on August 21, 2014. The principal purpose of the CEI was to assess your system's adequacy in minimizing Sanitary Sewer Overflows (SSOs). EPA is engaged in a nationwide assessment of collection systems which convey wastewater to medium-sized (10 - 100 MGD) and large-sized (100+ MGD) Wastewater Treatment Plants (WWTPs).

Based on the information provided during the CEI, the Egg Harbor Township Municipal Utilities Authority (EHTMUA) has experienced approximately 31 SSOs in the past five (5) years. Based on records provided to EPA, at least four (4) of these events discharged to surface water bodies; however, additional SSOs that entered storm drains may also have reached surface water bodies.

The EPA is charged with the protection of human health and the environment under the Clean Water Act (CWA or Act), 33 U.S.C. §§ 1251 *et seq.* Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

You are hereby required, pursuant to Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to report the following to the EPA in writing:

1. Within forty-five (45) calendar days of receipt of this RFI, submit to EPA a copy of Egg Harbor Township's Municipal Separate Storm Sewer System (MS4) map, or similar map, identifying areas of the Township where storm drains flow to surface water bodies.

2. Within forty-five (45) calendar days of receipt of this RFI, identify which, if any, SSOs reported between January 2010 and the present discharged to surface water bodies via the Egg Harbor Township MS4.

All information required to be submitted by this RFI shall be sent by certified mail or its equivalent to the following address:

Douglas McKenna, Chief
Water Compliance Branch
Division of Enforcement and Compliance Assistance
United States Environmental Protection Agency
290 Broadway, 20th Floor
New York, NY 10007-1866

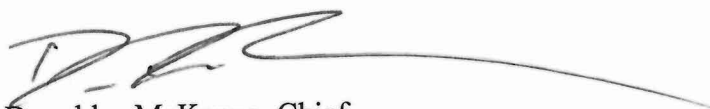
Any documents to be submitted by you must be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 C.F.R. § 122.22), and shall include the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine and imprisonment for knowing violations."

Failure to provide the required information may subject the facility to civil/criminal penalties pursuant to Section 309 of the CWA. Failure to comply with the RFI shall also subject the Facility to ineligibility for participation in work associated with Federal contracts, grants or loans. Enclosed is a copy of the CEI Report detailing EPA's findings from the August 21, 2014 CEI. Additionally, further guidance and information concerning the control of SSOs may be found by accessing the following web site: http://cfpub.epa.gov/npdes/home.cfm?program_id=4.

If you have any questions regarding this Request for Information or the enclosed CEI Report, please contact Larry Gaugler, P.E., NPDES Team Leader, via phone at (212) 637-3950, or Ms. Katherine Mann of my staff at (212) 637-4226.

Sincerely,



Douglas McKenna, Chief
Water Compliance Branch

Enclosure

cc: Melissa Hornsby, NJDEP w/enclosure



United States Environmental Protection Agency
Washington, D.C. 20460
Water Compliance Inspection Report

Form Approved.
OMB No. 2040-0057
Approval expires 8-31-98

Section A: National Data System Coding (i.e., PCS)

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| Transaction Code | | NPDES | | yr/mo/day | | Inspection Type | | Inspector | | Fac Type | | | | | | | | | | | | | | | | | | | |
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| Inspection Work Days Facility Self-Monitoring Evaluation Rating B1 QA Reserved | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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Section B: Facility Data

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|--|--|---------------------|------------------------|
| Name and Location of Facility Inspected (for industrial users discharging to POTW, also include POTW name and NPDES permit number) | | Entry Time/Date | Permit Effective Date |
| Egg Harbor Township MUA 3515 Bargaintown Road Egg Harbor Township, NJ | | 11:30 AM / 8/21/14 | N/A |
| | | Exit Time/Date | Permit Expiration Date |
| | | 4:00 PM / 8/21/14 | N/A |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) | | Other Facility Data | |
| Elaine Super, Egg Harbor Township MUA Clerk Bill Hiller, Licensed Operator Vince Palistino, Egg Harbor Township MUA Engineer | | SIC Code 4952 | |
| Name, Address of Responsible Official/Title/Phone and Fax Number(s) | | | |
| Elaine Super Egg Harbor Township MUA 3515 Bargaintown Road Egg Harbor Township, NJ | | | |

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

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|-------------------------------------|--------------------------|--------------------------|-------------------------|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | Permit | <input type="checkbox"/> | Flow Measurement | <input checked="" type="checkbox"/> | Operations & Maintenance | <input checked="" type="checkbox"/> | CSO/SSO (Sewer Overflow) |
| <input checked="" type="checkbox"/> | Records/Reports | <input type="checkbox"/> | Self-Monitoring Program | <input type="checkbox"/> | Sludge Handling/Disposal | <input type="checkbox"/> | Pollution Prevention |
| <input type="checkbox"/> | Facility Site Review | <input type="checkbox"/> | Compliance Schedules | <input type="checkbox"/> | Pretreatment | <input type="checkbox"/> | Multimedia |
| <input type="checkbox"/> | Effluent/Receiving Water | <input type="checkbox"/> | Laboratory | <input type="checkbox"/> | Storm Water | <input type="checkbox"/> | Other: |

Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

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| See attached report. |
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| Name(s) and Signature(s) of Inspector(s) | Agency/Office/Phone and Fax Numbers | Date |
| Katherine Mann, Physical Scientist | EPA/WCB/(212) 637-4226/FAX: 637-3953 | 2/3/15 |
| Signature of Management Q/A Reviewer | Agency/Office/Phone and Fax Numbers | Date |
| Larry Gaugler, P.E., NPDES Team Leader | EPA/WCB/(212) 637-3950/FAX: 637-3953 | 2/11/15 |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, DECA-WCB
20th Floor, 290 Broadway, New York, NY 10007

Satellite Sanitary Sewer System Compliance Evaluation Inspection

Inspection Date: August 21, 2014

Name of Satellite Sanitary Sewer System: Egg Harbor Township

Address of Satellite Sanitary Sewer System: 3515 Bargaintown Rd, Egg Harbor Township, NJ

NJPDES No.: NJP000344

EPA Representative: Katherine Mann, Water Compliance Brach, DECA, USEPA Region 2

Collection System Representatives:

Elaine Super, Egg Harbor Township MUA Clerk,
Bill Hiller, Licensed Operator
Vince Palistino, Egg Harbor Township MUA Engineer

I. BACKGROUND AND FINDINGS

Collection System:

1. The purpose of this Satellite Sanitary Sewer System Compliance Evaluation Inspection (CEI) was to assess the adequacy of the system's minimization of Sanitary Sewer Overflow (SSO) discharges. This CEI was conducted as part of an EPA nation-wide initiative to make such assessments of satellite sanitary sewer systems of medium-sized Wastewater Treatment Plants (WWTPs), defined as WWTPs with design capacities between 10 and 100 MGD, and large-sized WWTPs, defined as WWTPs with design capacities in excess of 100 MGD.
2. The Egg Harbor Township (EHT or "Township") Municipal Utilities Authority (MUA) collection system is a satellite sanitary sewer system of the Atlantic County Utilities Authority (ACUA) Wastewater Treatment Facility, NJPDES No. NJ0024473, a medium-sized WWTP.
3. A copy of the 1973 agreement between the ACUA and the EHTMUA (among other municipalities, authorities and the Atlantic City Sewerage Company) was provided to EPA at the time of the CEI. There is not a flow allotment for any of the contributing entities in the agreement to the ACUA.

4. According to EHTMUA representatives, the population in the Township serviced by the sanitary sewer system is approximately 38,000. Approximately 6,000 are still on septic. The Township is approximately 68 square miles.
5. According to EHTMUA representatives, there are no upstream contributors of flow to the collection system.
6. The Township consists entirely of separate sanitary and storm sewers and dates back to 1968.
7. Sanitary sewer piping consists of mainly of PVC (90%), as well as ductile iron, concrete, and a very small portion of asbestos piping. Pipe diameters range from 8" – 36" (residential and commercial laterals are generally 6").
8. EHTMUA representatives were not certain of the total length of the collection system or number of manholes, but estimated that there are approximately 210 miles of sanitary sewer piping and approximately 3,000 manholes.
9. According to EHTMUA representatives, approximately half of the system is mapped in GIS, and as-builts are available for the remaining half.

Pump Stations:

10. The EHTMUA owns and operates 50 pump stations. At the time of the CEI, all but 10 stations were equipped with Mission control, and EHTMUA representatives indicated that these would be getting Mission control within the fiscal year. Pump stations that did not have Mission control at the time of the CEI were equipped with Chatterbox dialers.
11. Should there be a problem at a pump station, the first primary contact is ACUA, where there is 24-hour personnel. EHTMUA representatives stated that the EHTMUA has an agreement with ACUA to do emergency responses/pump station maintenance. The secondary contact for pump station responses is Mr. Bill Hiller, Licensed Operator, followed by Mr. Vince Palistino, EHTMUA Engineer, then Ms. Elaine Super, EHTMUA Clerk. EHTMUA representatives stated that the Mission system notifies contacts via emails; if emails are not acknowledged, then calls are placed.
12. The abovementioned agreement with ACUA has been in place since 2003. A copy of the most recent version of the agreement (updated in 2011) was provided at the time of the CEI.
13. According to EHTMUA representatives, approximately half of the pump stations are equipped with permanent generators (high flow stations), and a portable generator is available for the stations without.
14. At the time of the CEI, a bypass pump was set up at the Miami pump station, which had been offline since Hurricane Sandy. EHTMUA representatives stated that they were trying to eliminate station all together and direct sewage via gravity to Bayport pump station across the street.

15. At the time of the CEI, a list of Township pump stations was provided to EPA that identified, among other things, the location, date of construction, type of pump/manufacturer, pump capacity, runtime hours per week, whether there is a generator present, discharge point and collection areas for each station.
16. During the CEI, EHTMUA representatives identified the locations where the EHTMUA collection system ties into the ACUA system. Flow is metered by the ACUA at these locations. There are two (2) locations in Somers Point, one (1) in Pleasantville, two (2) in Longport, and one (1) in Absecon; there are also three (3) points where the EHTMUA ties into the Coastal Interceptor at ACUA pump stations.
17. There are intermunicipal agreements in place between EHTMUA and Somers Point and Pleasantville for EHTMUA's flow contribution to these collection systems. For Absecon and Longport, EHTMUA flows directly to ACUA pump stations located in the municipalities, and does not enter either the Absecon or Longport collection systems. EHTMUA pays Somers Point and Pleasantville annually for its flow contributions. Agreements were reviewed at the time of the CEI. While the agreement between EHTMUA and Pleasantville (2010) requires EHTMUA to reimburse Pleasantville for a portion of what the ACUA charges, EHTMUA pays a flat fee to Somers Point per their agreement, which was negotiated in 1992.

Flow Metering and Billing:

18. The EHTMUA meters the flow on Delilah Road so that it can reimburse Pleasantville. The ACUA also meters flow, as mentioned above.
19. The Township is billed quarterly by ACUA based on estimated annual flows (then adjusted based on actual flows at the ACUA stations) from the EHTMUA to ACUA.
20. Residents are billed by EHTMUA based on Equivalent Dwelling Units (EDUs) (80,000 gallons of water per EDU) and pay a flat rate, quarterly. The flat rate includes the first 80,000 gallons, after which \$5.75 is charged per 1,000 gallons.

SSO Discharges:

21. Based on review of SSO forms provided to EPA by the EHTMUA from 2010 – 2014, the EHTMUA has experienced approximately 31 SSOs in the past five (5) years, mostly due to blockages, and occasionally, pump station failures. There has been only one (1) basement backup in the past five (5) years.
22. According to the 2010 – 2014 SSO reports, only four (4) SSOs were reported to the NJDEP as reaching surface waters; however, an additional twelve (12) SSOs were reported as entering storm drains. During the field portion of the CEI, EHTMUA representatives indicated that some storm drains flow to surface water bodies, while other storm drains flow to retention basins.

23. Written procedures for responding to residential backup complaints, back-ups inside homes and overflowing manholes are included in the EHTMUA's operation and maintenance manual. Copies of the written procedures, as well as forms used to document complaints and sewer spills, were provided to EPA at the time of the CEI.
24. According to EHTMUA representatives, if a pump station alarm goes off, ACUA would respond and get the pump station back online, but EHTMUA would use its emergency contractor to clean up a spill if there was one. EHTMUA has an emergency contract with Caprioni Family Septic (Caprioni). Caprioni also does regular monthly wet well and basket cleaning, maintenance jetting and miscellaneous repairs.
25. EHTMUA representatives stated that if there is an overflowing manhole unrelated to a problem at a pump station, the call would come to the EHTMUA office or to the police department after hours. The police department dispatcher has EHTMUA's emergency number that gets transferred to whoever is on-call. EHTMUA representatives stated that if a call comes in, a work order is created immediately. Field staff utilize a standard complaint sheet, and the cause of the event (e.g., grease, rags) is tracked.

Residential Complaints / Collection System Insurance:

26. Residential complaints are tracked and linked through the resident's billing account.
27. The EHTMUA is responsible for issues in the sewer main up to the cleanout closest to the street.
28. In response to residential complaints, the EHTMUA will investigate, and if possible, will resolve the problem using a plunger; otherwise, Caprioni is contacted.
29. EHTMUA representatives stated that they receive approximately one (1) residential call every other week.
30. The EHTMUA maintains insurance for the collection system through the NJ Utilities Authority Joint Insurance Fund. EHTMUA representatives stated during the CEI that there were no sewer related claims made or paid in the past five (5) years.

Capacity Issues / Collection System Maintenance:

31. According to EHTMUA representatives, EHTMUA has not experienced any major capacity issues, force main failures or collection system cave-ins in the past five (5) years, with the exception of a July 2013 force main break caused by Verizon, resulting in the discharge of approximately 1,500 gallons of sewage, a minor amount of which could not be contained and flowed to a Tributary of Patcong Creek.
32. The EHTMUA utilizes the following methods to minimize excessive Infiltration and Inflow (I&I) to the collection system:

- Annual video inspection of areas of concern, chosen primarily based on age of the system (beginning with the oldest areas), as well as areas with known grease problems or root intrusion;
- Evaluation of daily reports from the Mission system that show any flow variation;
- In the past, the EHTMUA has conducted smoke tests to find breaks;
- Replacement of broken cleanouts identified using video, paid for by EHTMUA (part of EHTMUA's capital plan);
- Implementation of a six-year pump station rehabilitation plan, including converting can stations to submersible pump stations;
- Removal of asbestos cement pipe and replacement with PVC in phases over the past five (5) years (removed all but 2%);
- Lining of an area of 27-36" pipe planned and funded for 2015;
- Installation of manhole inserts in select locations;
- Local law prohibiting inflow to the system;
- Mailing of letters to residents with sump pump connections to the sanitary sewer in 2009 and 2010 (EHTMUA representatives stated that not many sump pump connections had been identified since); and
- EHTMUA representatives stated that during responses to residential complaints or SSOs, field personnel inspect to see if there are any suspected inflow sources.

33. The EHTMUA utilizes the following methods to minimize grease accumulation in the sanitary sewer system:

- Implementation of an extensive grease trap inspection program. EHTMUA representatives stated that there are approximately 145 grease traps in the Township, all of which are monitored very closely by the EHTMUA. According to EHTMUA representatives, the EHTMUA inspects new establishments monthly until they are satisfied that the business is doing a good job. Thereafter, grease traps are inspected every 4-5 months. A copy of the EHTMUA's grease trap inspection form was provided to EPA at the time of the CEI.
- Distribution of a "Fat Free Sewers" pamphlet, as well as a notice regarding Grease, Fat, & Oil included in a mailing sent to residents at beginning of each billing period, both of which were provided to EPA at the time of the CEI.
- Locations of grease problem-areas are provided to Caprioni with a frequency for jetting each year. Mr. Hiller stated that he accompanies Caprioni on all of their activities and signs off on the receipt. EHTMUA keeps all documentation of cleaning activities. A copy of an Excel table documenting the locations and lengths of pipe jetted in 2014 (up to the date of the CEI) as part of EHTMUA's preventative maintenance program was provided to EPA at the time of the CEI. The table included 22 locations and 32,300' of pipe cleaned from February – August 2014.

34. In addition to the I&I and grease minimization efforts identified above, the EHTMUA's preventative maintenance program also includes the following:

- Jetting performed in conjunction with televising;

- Removal of roots identified during televising;
- Annual inspection of the eight (8) bridge force mains;
- Inspection of all pump stations two (2) times per week, once by ACUA and once by the EHTMUA (depending on inspection findings, the ACUA either immediately takes action or informs the EHTMUA of suggested maintenance);
- A wet well and basket cleaning schedule is determined each year (EHTMUA representatives stated that a schedule, based on history of the stations, is made as part of the bidding process);
- In addition, the EHTMUA directs Caprioni which stations need cleaning based on their weekly inspection findings.

35. Equipment owned by the EHTMUA for maintenance uses includes, but is not limited to the following:

- Two (2) utility trucks
- Portable generator
- One (1) bypass pump
- Caprioni provides jetter and vacuum truck

36. According to EHTMUA representatives, televising is conducted annually and is contracted to the lowest bidder. EHTMUA representatives estimated that 35% of the system has been televised.

37. According to EHTMUA representatives, approximately 10% of the collection system is cleaned annually.

Enforcement Order(s)

38. There are no existing Orders on Consent between the NJDEP and the EHTMUA related to EHTMUA's sanitary sewer system.

Municipal Separate Storm Sewer System (MS4):

39. The EHTMUA does not operator or maintain the Township MS4. EHTMUA representatives stated that, Jim Mott, Township Engineer, is the MS4 contact for the Township.

40. According to EHTMUA representatives, there are no known cross connections between the sanitary sewer system and the MS4.

II. FIELD WORK

During the CEI, EPA and EHTMUA representatives visited the following locations within the Township:

1. SSO manhole located on Martin Avenue next to the NJ American Water Company. Pine needles and other debris collected in an open-top 750,000-gallon storage tank were discharged with spent water from iron removal to the sanitary sewer and caused a blockage. Manhole was flowing fine at the time of the CEI.



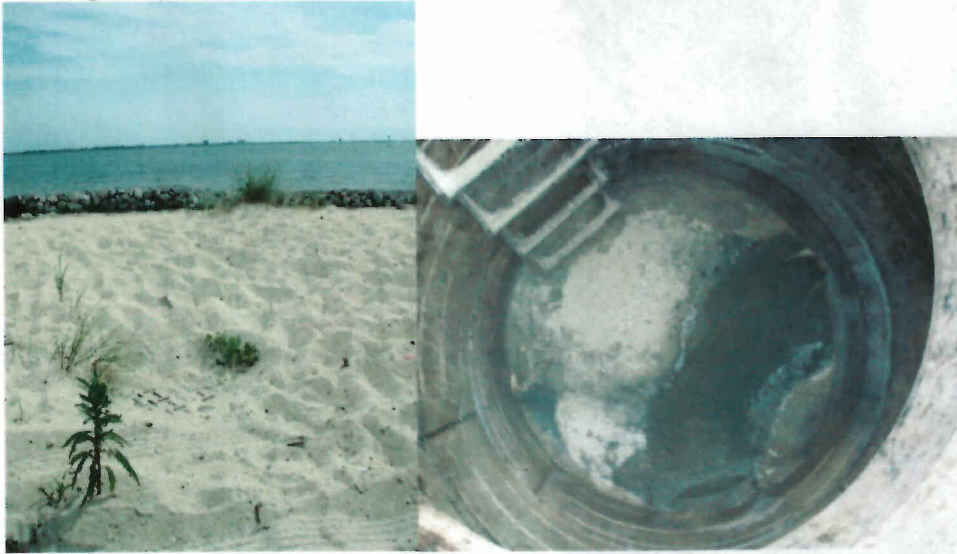
2. Cardiff Mall Pump Station (Chatterbox station; was not equipped with Mission control at the time of the CEI); one (1) photo of wet well.



3. SSO manhole located near Abbey Court and Kingsley Drive; SSO occurred on 9/29/2012 due to an electrical problem at the Storybook pump station. The SSO entered a stormwater catch basin, but according to EHTMUA representatives the catch basin drains to a retention basin and not to a surface water body. Caproni vacuumed the catch basin and applied lime. One (1) photo of manhole (flowing well).



4. Problem spot manhole located near Brenta Avenue and Bay Drive due to sand and lack of pitch. EHTMUA representatives stated this manhole gets jetted once per month. Two (2) photos including manhole cover in sand/proximity to Bay, and manhole (sand identified but flowing fine).



5. Miami Pump Station bypass. Two (2) photos including can ~17 feet deep, mostly filled with water, and wet well with suction hose to Godwin pump.



III. SUMMARY

Based on the information provided during the CEI, the EHTMUA has experienced approximately 31 SSOs in the past five (5) years. In order to promote a more comprehensive sanitary sewer maintenance program, and to minimize the occurrence of SSOs, EPA recommends the following:

1. Develop and implement written preventative maintenance procedures. Among other things, the procedures should accurately document the City's preventative maintenance efforts, coordination with the ACUA and Caprioni Family Septic (or other contractor(s), as applicable), and should identify problem spot areas and frequency at which to inspect and clean.
2. Increase the frequency at which the entire sanitary sewer system is cleaned.
3. Maintain a copy of Egg Harbor Township's Municipal Separate Storm Sewer System (MS4) map so that field personnel are aware of the areas in the Township where storm drains flow to surface waters, and that SSOs entering such storm drains are accurately reported to the NJDEP.